

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

JAN 13 2014

David J. Bradley, Clerk

United States of America

Kristen Hilary Washington v.

YOB: 1985

POB: United States

Citizenship: USC

Case No. M-14-0071-M

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 12, 2014 in the county of Hidalgo in the Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21USC 841	defendant did knowingly and intentionally import into the United States from the United Mexican States approximately 28.84 kilograms of cocaine, a Schedule II controlled substance, and defendant did knowingly and intentionally possess with the intent to distribute approximately 28.84 kilograms of cocaine, a Schedule I controlled substance
21USC952	

This criminal complaint is based on these facts:

On Janauary 12, 2014, a 2006 Mazda CRX arrived at the Hidalgo, Texas Port Of Entry. United States Customs and Border Protection Officer (CBPO) Mark Lewis was working the primary inspection area where he obtained a negative declaration for alcohol, tobacco, firearms, and narcotics from the driver, Kristen Hilary Washington. CBPO Lewis observed Washington appeared nervous during questioning and he referred her to secondary form further inspection.

✓ Continued on the attached sheet.

*Complainant's signature*

Adrian Olivarez, HSI Special Agent

Printed name and title

*Approved to file Thimberly Banks  
AUSA*

Sworn to before me and signed in my presence.

Date: 1/13/2014

8:44 a.m.

*Peter E. Ormsby*

Judge's signature

Peter E. Ormsby, U.S. Magistrate Judge

Printed name and title

City and state: McAllen, Texas

**ATTACHMENT "A"**

While at the secondary inspection, CBPO Horacio Pena also obtained a negative declaration from Washington. CBPO Pena observed tampering to the rocker panels of the vehicle and he referred the vehicle to the Gamma Ray Non-intrusive Inspection where CBPOs noticed anomalies on the rocker panels. CBP Canine Officer R. Briseno conducted a K-9 search of the vehicle and the K-9 alerted to the presence of narcotics in the rocker panels of the vehicle. Further inspection of the rocker panels revealed a compartment which resulted in the discovery of twenty-six (26) bundles wrapped in cellophane tape which contained a white powdery substance that field tested positive for cocaine. The total weight of the 26 bundles of cocaine was 28.84 kilograms.

In a post Miranda interview, Washington admitted she knew she was smuggling cocaine in her vehicle and was going to deliver it to a northern destination. Washington stated she had successfully smuggled narcotics through the port of entry once and admitted she delivered the narcotics to an unknown male in Houston, Texas. Washington stated she was paid \$5000 for her first smuggling attempt. Washington did not know how much she was going to be paid on this attempt.